

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

WILLIAM LOCKWOOD

Plaintiff

v.

Civil Action No. WMN-02-CV-2068

PACIFIC USA, LTD., et al.

Defendants

\* \* \* \* \*

AFFIDAVIT OF DIANNE SAUNDERS

I, Dianne Saunders, declare under penalty of perjury that the following is true and correct:

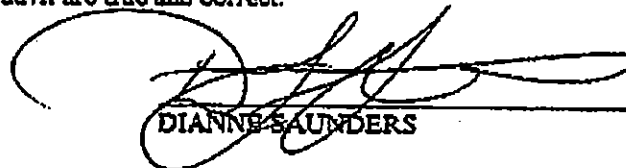
1. I am over the age of eighteen and am competent to testify to the following matters set forth herein which are based upon my personal knowledge.

2. I am currently employed as the finance director for Len Stoler, Inc. My office is located at the Len Stoler Dealership in Reisterstown, Maryland.

3. As of August 19, 2003, my earnings-to-date from Len Stoler, Inc. were \$118,424.00 for the first 33 weeks of the year, or \$3,588.61 per week.

4. At the conference on August 19, 2003, I estimated a day's earnings to be \$700.00.

I DO SOLEMNLY DECLARE AND AFFIRM under the penalties of perjury that the contents of the foregoing Affidavit are true and correct.

  
DIANNE SAUNDERS